Koppers, Mary Margaret

From: Dale Rushneck [RUSHNECK.DALE@worldnet.att.net]
Sent: Thursday, January 14, 1999 7:13 PM
To: Cindy Simbanin
Cc: Paul Britton; Dick Reding; Chuck White; Mike Messner; Henry Kahn
Subject: Letter to Lichtenberg on IQE - Rev 3


LICHTY3.WPD

Attached.

Cindy, please find out from Bill who is to be copied on the letter, wait for final corrections or adjustments from those copied, then print the letter. If Bill shows up tomorrow, please give him the copy. If not, please FedEx to Bill's attention at:
Courtyard by Marriott
2101 W. New Haven Avenue
Melbourne, FL 32904
Phone: 407-724-6400
Fax: 407-984-4006

People who are copied: If you have a further correction or adjustment, please E-mail to Cindy with a copy to me.

Thanks

Dale

RUSHNECK.DALE@WORLDNET.ATT.NET <mailto:RUSHNECK.DALE@WORLDNET.ATT.NET>
Phone: 970-223-2013
Fax: 970-223-2008

4p

Mr. James J. Lichtenberg, Chairman
ASTM Committee D-19 on Water
100 Barr Harbor Drive
West Conshohocken, PA 19428-2959

Dear Mr. Lichtenberg:

I and other staff members at EPA have been following and involved in the efforts of ASTM Committee D-19 to develop an "inter-laboratory quantitation estimate" (IQE). Based on statements made by proponents of the IQE and actions of the Subcommittee responsible its development, we believe that the IQE is an attempt to undermine the ability of EPA to regulate pollutants and contaminants at low levels. Formal adoption of the IQE by ASTM would give the IQE status as a "voluntary consensus standard" under the National Technology Transfer and Advancement Act of 1995 (NTTAA) and Office of Management and Budget (OMB) Circular A-119. In a letter dated September 11, 1998, to Charles Fox, Assistant Administrator for Water, the Inter-Industry Analytical Group (IIAG) (an industry interest group whose members employ individuals on the ASTM D-19 Committee) has stated that EPA is "required to adopt" the IQE if it is approved by ASTM.

The D-19 Subcommittee responsible for development of the IQE has not provided adequate responses to the legitimate concerns of the negative voters. Rebuttals to the issues raised have been either superficial or have completely avoided important technical matters. Throughout balloting on the IQE, negative voters have stated variously that:

1. The definition of the IQE is inconsistent with its development.
2. There is no stated purpose for the IQE.
3. The IQE is arbitrary as a quantitation limit.
4. The IQE purports to estimate the lowest level at which reliable measurements can be made, but acknowledges that laboratories will be able to make reliable measurements at lower levels.
5. The IQE is based on the selection of the lowest true value concentration estimated to equal some arbitrarily selected number times a standard deviation of replicate measurements at that concentration.
6. Once an IQE is estimated, there is no iterative procedure to assure that it is consistent with the data from which it is developed.
7. The descriptive aspects of the IQE should more appropriately be considered as part of ASTM Standard D 2777.

For these reasons, EPA is informing ASTM Committee D-19 that the Agency does not intend to use the IQE should it be upheld through the balloting process and plans to inform OMB that the IQE, as a voluntary consensus standard, is inappropriate for use in EPA's regulatory programs.

If you have questions concerning this letter, please contact me as convenient.

Sincerely

William A. Telliard, Director
Analytical Methods Staff
Engineering and Analysis Division (4303)

cc: ??

Koppers, Mary Margaret

From: Dale Rushneck [RUSHNECK.DALE@worldnet.att.net]
Sent: Thursday, January 14, 1999 2:56 PM
To: Mary Margaret Koppers
Subject: Fw: Letter to Lichtenberg


LICHTY.WPD

Action continues in the world of detection and quantitation.

Dale

-----Original Message-----
From: Dale Rushneck < RUSHNECK.DALE@worldnet.att.net <mailto:RUSHNECK.DALE@worldnet.att.net>>
To: Henry Kahn < KAHN.HENRY@EPAMAIL.EPA.GOV <mailto:KAHN.HENRY@EPAMAIL.EPA.GOV>>
Date: Thursday, January 14, 1999 12:54 PM
Subject: Letter to Lichtenberg

Attached.

Dale

RUSHNECK.DALE@WORLDNET.ATT.NET <mailto:RUSHNECK.DALE@WORLDNET.ATT.NET>
Phone: 970-223-2013
Fax: 970-223-2008

Mr. James J. Lichtenberg, Chairman
ASTM Committee D-19 on Water
100 Barr Harbor Drive
West Conshohocken, PA 19428-2959

Dear Mr. Lichtenberg:

EPA has been following and involved in the efforts of ASTM Committee D-19 to develop an "inter-laboratory quantition estimate" (IQE). Based on statements made by proponents of the IQE and actions of the Subcommittee responsible for development of the IQE, EPA believes that the IQE is an attempt to set the stage for regulatory relief through use of an inappropriate voluntary consensus standard as required under the National Technology Transfer and Advancement Act of 1995 (NTTAA) and Office of Management and Budget (OMB) Circular A-119.

In ballots on the IQE, negative voters have stated variously that:

1. The definition of the IQE is inconsistent with its development.
2. There is no stated purpose or intent for the IQE.
3. The IQE is arbitrary as a quantitation limit.
4. The IQE does not attempt to estimate the lowest level at which reliable measurements can be made.
5. The IQE is based on the selection of the lowest true value concentration estimated to equal some arbitrarily selected number times a standard deviation of replicate measurements at that concentration.
6. Once an IQE is estimated, there is no iterative procedure to assure that the it is consistent with the data from which it is developed.
7. The descriptive aspects of the IQE should more appropriately be considered as part of ASTM Standard D 2777.

For these reasons, EPA is informing ASTM Committee D-19 that the Agency does not intend to use the IQE should it be upheld through the balloting process and plans to inform OMB that the IQE, as a voluntary consensus standard, is inappropriate for use in EPA's regulatory programs.

If you have questions concerning this letter, please contact me as convenient.

Sincerely

William A. Telliard, Director
Analytical Methods Staff
Engineering and Analysis Division (4303)